

FILED 28 OCT '14 14:57 USDC-ORP

UNDER SEAL

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

v.

**WILL MICHAEL aka
WILLIAM MICHAEL,**

Defendant.

3:14-cr-00432-KI

**INDICTMENT
[18 U.S.C. § 115;
18 U.S.C. § 875(c)]**

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Threatening Federal Law Enforcement Officer)

On or about April 12, 2014, in Portland, Multnomah County, in the District of Oregon, WILL MICHAEL, also known as WILLIAM MICHAEL, defendant herein, did unlawfully threaten to murder Mike Roop, Chief Ranger of the U.S. Bureau of Land Management for Oregon and Washington, a Federal law enforcement officer, with intent to impede, intimidate and interfere with Chief Ranger Mike Roop while he was engaged in the performance of his official duties, and with intent to retaliate against Chief Ranger Mike Roop on account of his official duties; all in violation of Title 18, United States Code, Section 115.

COUNT 2
(Interstate Threatening Communication)

On or about April 12, 2014, in Portland, Multnomah County, in the District of Oregon, WILL MICHAEL, also known as WILLIAM MICHAEL, defendant herein, did unlawfully and willfully transmit in interstate commerce via telephone from the State of Pennsylvania to the State of Oregon, a communication to Chief Ranger Mike Roop of the U.S. Bureau of Land Management for Oregon and Washington, and the communication contained a threat to injure and kill Chief Ranger Mike Roop; all in violation of Title 18, United States Code, Section 875(c).

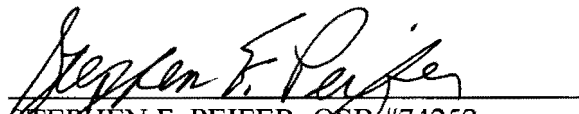
Dated this 28 day of October 2014.

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney
District of Oregon


STEPHEN F. PEIFER, OSB #74252
Assistant United States Attorney